

California Desert Grape Administrative Committee

82-901 Bliss Avenue ♦ Indio, California 92201

September 11, 2006

Marketing Order Administration Branch
Fruit and Vegetable Programs
Agricultural Marketing Service
U.S. Department of Agriculture
1400 Independence Avenue, S. W. STOP 0237
Washington, D. C. 20250-0127

Dear Sir/Madam:

Re: Proposed Change in the Desert Grape Marketing Order
Docket No. FV03-925-1 PR
Federal Register Notices of May 25, 2005, p. 30001;
July 25, 2005, p. 42513
September 27, 2005, p. 56378
July 11, 2006, p. 39019

I am writing as Chairman of the California Desert Grape Administrative Committee in strong support of the proposed rule to change the effective date period of the marketing order to April 1-July 10.

As you know, I submitted a letter on November 28, 2005, on the proposed rule. In that letter I discussed the fact that poor quality uninspected imported Chilean table grapes were in the domestic market at the time our Desert grapes are being harvested and marketed and the impact this had on prices of our grapes during the season.

The following comments will supplement my previous letter on the proposed rule.

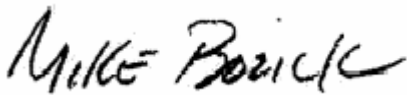
I wish to state that the representatives of the Chilean table grape industry who have filed statements with the Agricultural Marketing Service (AMS) have sought repeatedly to delay action on the proposed rule. They say the reason for the requested delays is to thoroughly review all the documents submitted in support of the proposal and push for a full record. Yet, a major portion of the information that the Committee (and the Desert Grape Growers League) have submitted in the past has come from the narrative EXIMFRUIT data. (Do not confuse this with Sermaco's statistical data). EXIMPORT is a publication of Sermaco which is a Chilean company that records and analyzes data on Chilean fruit exports, including table grapes, to the U.S. If the Chileans want to thoroughly evaluate and discount the EXIMFRUIT data, then they would be remiss if they did not include an analysis of this data. I note they have not done so to date.

I understand DGGL's comments describe the EXIMFRUIT 2005 and 2006 Chilean shipment season. This information alone provides the evidence to support the effective date change from April 20 to April 1.

The information provided by EXIMFRUIT is available for purchase, and I strongly urge AMS to purchase the publication as you will find the information provided supports that of the Committee.

In closing, I wish to say that the Committee supports the proposed change in the August 15 date to July 10 since a de minimus amount of desert table grapes are marketed after July 10. We also support clarification of the maturity requirements of the Flame seedless grape, as contained in the proposed rule. This change is already included in the California table grape standard.

Sincerely,

A handwritten signature in black ink that reads "Mike Bozick". The signature is written in a cursive, slightly slanted style.

Mike Bozick
Chairman
Desert Grape Administrative Committee